

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 23-160
)	
RODNEY THOMAS)	

SENTENCING MEMORANDUM

Rodney Thomas deeply regrets shooting a bald eagle in May 2023 when he was out hunting. Mr. Thomas thought he was aiming at a turkey vulture. As soon as he learned he'd shot an eagle, he contacted the Pennsylvania Game Commission and set up a meeting with them. "I want to take full responsibility. This was a terrible mistake," he told officers during his interview, "I swear to god I thought it was a turkey vulture."¹ "I can't teach accountability to my children if I'm not doing it myself," said Mr. Thomas.²

In advance of the sentencing hearing, Mr. Thomas plans to present additional information to the Court about his character, including his family responsibilities.

For these reasons, including those that will be presented at the sentencing hearing, incarceration and supervision are unnecessary to fulfill the purposes of sentencing in this matter. Rodney Thomas asks the Court to sentence him under the terms of the Joint Stipulation (ECF 34), requiring him to pay restitution and forfeit

¹ Videotaped interview of Rodney Thomas, May 15, 2023, at approx. 1:40. Received in Rule 16 discovery.

² *Id.* at approx. 05:30.

the air rifle used in the crime. No additional sanctions are necessary under the 18 U.S.C. § 3553(a) factors.

Respectfully submitted,

/s/ Sarah Levin

Sarah Levin

Assistant Federal Public Defender